

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
WILLIAM BENNETT GOURLEY	:	
aka William Gourley	:	CASE NO. 1:20-bk-02668
KATHLEEN DENISE GOURLEY	:	
Debtors	:	
	:	
PNC BANK, NATIONAL	:	
ASSOCIATION,	:	
Movant	:	
	:	
v.	:	
	:	
WILLIAM BENNETT GOURLEY	:	
aka William Gourley	:	
KATHLEEN DENISE GOURLEY,	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Denied that Debtors have "failed" to make said payments. The Debtors were granted an extended Covid deferral. When that ended, they began making their payments again.
7. Denied. The Debtors were granted an extended Covid deferral. When that ended, they began making their payments again.
8. Denied that Movant has demonstrated cause for relief.
9. Denied that Debtors are \$400 in arrears with their plan payments. They are currently \$250 behind, which will be caught up by bi-weekly wage attachment payments.

10. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

11. Denied that Movant is entitled to reimbursement of fees and costs because the Debtors' mortgage payments were deferred during the pandemic.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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